

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Darnell Brown, Jeremiah Jones, Ronald Turner, and
Terri Coleman, and, on behalf of themselves and others
similarly situated in the proposed FLSA Collective
Action,

1:23-cv-03029

STIPULATION

Plaintiffs,

– against –

CE SOLUTIONS GROUP, LLC, CE SOLUTIONS
INC., CE RESERVE CORP., CE FLAGGING PLUS
CORP., ARGANI, INC., HASSAN SABLINI, and
JEANNINE NAPOLEONE-COLBERT,

Defendants.

WHEREAS The parties are engaged in settlement discussions, have agreed in principle, and are waiting for Plaintiffs' counsel to withdraw their representation on one Plaintiff.

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel as follows:

The time for Defendants CE Solutions Group, LLC, CE Solutions, Inc., CE Reserve Corp., CE Flagging Plus Corp., Argani, Inc. Hassan Siblani and Jeannine Napoleone-Colbert to move or otherwise respond to the Complaint in the above-captioned action is hereby extended to January 1, 2024.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts, and electronic or facsimile signatures shall have the same force and effect as originals.

DATED: New York, New York
December 1, 2023

Levin-Epstein & Associates, P.C.

Attorneys for Plaintiffs

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